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April 14, 2014

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the Truck and Bus Regulation - SUPPORT

Members of the Air Resources Board:

This Association represents union roofing contractors in 14 Metropolitan San Francisco Bay Area Counties. We are writing today to express our support for the proposed amendments to the Truck and Bus regulation.

Our contractor members are small construction businesses that were devastated by the impact of the recent recession. The volume of union roofing work declined by more than 35 percent and remained stagnant for several years. Only now are union work hours slowly beginning to increase. The last things that our members need in this challenging business environment are increased equipment costs and additional regulatory burdens.

Easing the requirements for small fleets, low-use vehicles and dedicated work trucks will provide our members with welcome regulatory relief. This will allow them to concentrate their energies where they are most needed: generating employment opportunities for union roofers.

Thank you for recognizing and responding to the needs of small construction employers through the proposed amendments to the Truck and Bus Regulation.

Yours Very Truly,

William D. Callahan, Ph.D.
Executive Director